



**Michael D. Adams**

21 June 2013

Re: Proceeding RM-11699

I cautiously support the idea of permitting the use of encryption in the amateur radio service in very limited circumstances.

While I acknowledge that the nature of amateur radio is such that permitting encryption would seem inconsistent, I believe there are two reasons to tolerate encryption on a limited basis.

First, as noted by the petitioner, agencies that incorporate amateur radio as a means for backup/auxiliary communications in disaster/emergency planning find the prohibition on encryption in the amateur radio service problematic. Several commenters have noted that there has been significant debate among amateur radio operators on the internet regarding this apparent conflict.

In the online debate, opponents of encryption correctly note that circumstances where amateur radio would be relied upon for emergency communications correspond to those circumstances where privacy regulations are generally waived, and that the messages expected under such circumstances can be crafted in such a way as to avoid the need to disclose sensitive information.

I personally applaud any line of thinking that encourages individuals and organizations to consider what kinds of personal information actually need to be shared. However, privacy advocacy aside, I believe supporters of encryption have a stronger argument: agencies that could make use of amateur/auxiliary communications in emergencies are increasingly unwilling to see amateur radio as a potential resource because of the lack of encryption from hams' communications toolbox. Granting a limited exception against the current prohibition on encryption would assist amateurs with "getting their feet in the door" with such agencies, supporting one of the stated purposes of the amateur radio service: public service.

I would also suggest a second reason to permit a limited tolerance to encryption in the amateur radio service: the Commission has long recognized the value of amateur radio as a place for non-professionals to experiment in radio communications.

Communications technology is evolving in such a way that certain modes of encryption (or obfuscation) are likely to become common in the future. Whether such a development is positive or negative is debatable; the fact of the matter is that it is happening.

I believe it would be consistent with the concept of amateur radio being a sandbox for experimenters to create a means by which individuals could explore such concepts and technologies. However, it would be appropriate for the Commission to seek some form of records retention or public disclosure in the event of experimentation, to maintain consistency with the tradition of amateur radio as an open communications channel.

In summary, while I am leery of permitting encryption in spite of the traditions of amateur radio, I believe the potential benefits outweigh the downsides, and therefore I express my support for the proposal.

Sincerely,

A handwritten signature in blue ink, reading "Michael D. Adams", with a long horizontal flourish extending to the right.

Michael D. Adams, N1EN